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December 19, 2007

**BY HAND DELIVERY**

Judge Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 650  
New York, NY 10007

**Extension Granted**

USDC SDNY

DOCUMENT

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DOC #:

DATE FILED: 12/19/07

Re: Zim Integrated Shipping Services, Ltd. v. Belco Resources, Inc. et al.  
Southern District of New York 07 Civ. 5861 (RMB/GWG)  
Date: 12/19/07  
**Richard M. Berman, U.S.D.J.**

Dear Judge:

We are attorneys representing plaintiff Zim Integrated Shipping Services, Ltd., in connection with the above captioned civil action and we are writing you to request an extension of time of two (2) weeks to file our responses to defendants' joint motions to dismiss and to vacate our client's complaint and prayer for a Rule B attachment.

According to your Order dated October 18, 2007, plaintiff's responses are due on Friday December 28, 2007 and Defendants' replies on January 18, 2007. We contacted defendants' counsels on December 17 to request their consent to our extension of time. Defendant Sinochem Jiangsu Corporation's counsel responded to us yesterday evening that their client does not oppose to our request for an extension of time, to the extent "all remaining due dates (be) extended three weeks so as to get beyond previously-scheduled vacations". Counsel for Nanjing Huabin Foreign Trade & Economics Co., Ltd. consents to our request but requires similarly an extension of the time for the reply. We have not been able to get in touch with Defendant Belco Resources, Inc.'s counsel.

The extension of time is sought because of two issues. First, we are encountering difficulties to have witnesses in the U.S., Israel and the Far East available at this time of the year to review certain allegations of facts or of law made by the defendants in their motion papers and execute affidavits in support of our opposition. Second, the complexity and length of the two joint motions filed by the three defendants necessitate a lot of resources and time from our firm which, at this time of the year, is considerably strained.

At the scheduling conference on October 18, Your Honor has acknowledged that December 28 may prove a difficult date, and indicated further there could be some leeway. We further draw the Court's attention on the fact that the defendants have had approximately six full weeks to file their joint

Letter to Judge Berman

December 19, 2007

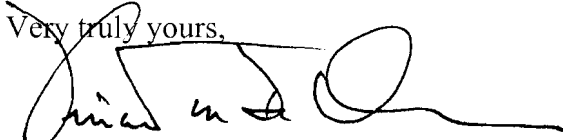
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motions whereas plaintiff was only afforded four weeks. This is our first request for adjournments or extensions in this matter.

Consequently, we respectfully request that the date for Plaintiff to file his responses be extended to Friday January 11, 2008 and that defendants' time to reply be extended until Friday February 8, 2008.

We thank Your Honor for his attention in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Vincent M. DeOrchis' or 'Olivier D. L. DuPont', written over a horizontal line.

Vincent M. DeOrchis/ Olivier D. L. DuPont

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